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April 27, 2021

**Via ECF**

Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl St., Courtroom 6B  
New York, NY 10007

**MEMORANDUM ENDORSEMENT**

**Re: *Contrera et al. v. Langer et al.***  
**Docket No.: 16-cv-03851 (LTS)(GWG)**  
**MLGB File No.: 13057-00100**

Dear Judge Gorenstein:

This firm represents Defendants in the above-referenced matter, and we write jointly with Class Counsel in connection with Your Honor's Order granting an adjournment of time to submit a Motion for Final Approval, and a rescheduled date for a Fairness Hearing (Docket Entry ("DE") 433). The Parties continue to cooperate in connection with revising the Joint Conditional Stipulation of Settlement and Release preliminarily approved on November 4, 2020 (DE Nos. 429, 431) (the "Agreement") in limited fashion to include additional individuals who have come forward to allege they should be included as Class Members in this matter (collectively "Aspiring Members"). *See* Joint Letter, DE 432.

The Parties expect to submit the limited revisions to the Agreement, along with the additional limited Notice provisions applicable to Aspiring Members, for the Court's endorsement on or before May 7, 2021. The Parties therefore request a brief adjournment of: (A) the time by which Plaintiffs must submit a Motion for Final Approval from April 29, 2021 to June 11, 2021; and (B) the currently scheduled Fairness Hearing from May 3, 2021 to any day beginning the week of June 21, 2021, at the Court's convenience.

Pursuant to Your Honor's Rules of Individual Practice, Rule 1.E: (i) the Parties seek an adjournment of the dates for submitting a Motion for Final Approval and of the scheduled Fairness Hearing as noted herein; (ii) this is the follow-up to the Parties' first request for an adjournment of these dates (*see* DE Nos. 432, 433); (iii) the reasons for these adjournments are to allow the Parties to finalize limited revisions to the Agreement and limited Notice provisions to Aspiring Members, to allow the Court to endorse such limited revisions and Notice procedures, and to allow the Parties to effectuate such Notice procedures on the Aspiring Members (including allowing same sufficient time to object/opt-out of the Agreement); and (iv)

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all Parties consent to and join in this request. The Parties also note such adjournment would effectuate no other changes to any other scheduled dates herein.

Thus the Parties respectfully request the Court: (i) adjourn the date by which Plaintiffs must submit a Motion for Final Approval from April 29, 2021 until June 11, 2021; and (ii) adjourn the Fairness Hearing currently scheduled for May 3, 2021 to any date during the week of June 21, 2021 at a time convenient for the Court, so as to enable the inclusion of the Aspiring Members in this matter.

The Parties sincerely thank the Court for its time and consideration of the foregoing request.


Respectfully submitted,

/s/ Christopher P. Hampton  
Christopher P. Hampton, Esq.

cc: All Counsel of Record (via ECF)

**The Motion for Final Approval shall be filed by June 11, 2021. The Fairness Hearing is adjourned from May 3, 2021 to Thursday, June 24, 2021, at 4:00 p.m.**

**So Ordered.**

  
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GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
**April 27, 2021**